

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA, v. Zhaohui Qin, Defendant.	1:20PO436 CASENO. 7626838
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MOTION TO ADVANCE

COMES NOW, Defendant, Zhaohui Qin, by and through Shaoming Cheng, Esquire and Cheng Yun Law PLLC, hereby respectfully makes the following request:

This case has been set for hearing on April 20, 2020 at 9:00 AM. However, the Defendant has previously scheduled a trip traveling back to Beijing, China on March 19, 2020 (Exhibit 1). The clerk office has confirmed that the police officer is available on March 16, 2020. All parties' next available date is March 16, 2020. In addition, U.S. Attorney does not object to the advance.

Therefore, the Defendant's Counsel respectfully requests this honorable court to advance this case to March 16, 2020.

Respectfully submitted,



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Dated: March 6, 2020

Exhibit 1



ITINERARY

BOOKING DETAILS

ORDER ID/订单号: 11967262458

PASSENGER/旅客: QIN/ZHAOHUI

TICKET NUMBER/票号: 180-3368582079

ISSUING AIRLINE/出票航空公司: Korean Air

ISSUE DATE/出票日期: 3JAN 2020

GDS PNR/预订编号: L8842E

ISSUED AGENT/出票代理: CSX262

FLIGHT DETAILS

DATE 日期	AIRLINE PNR 航空公司 预订编号	FLIGHT 航班号	DEPARTURE/始发 TIME/时间 TERMINAL/航站楼	ARRIVAL/抵达 TIME/时间 TERMINAL/航站楼	CLASS 舱位等级	STATUS 状态
31-JAN-20	L8842E	KE854	PEK-Beijing 21:55 TERMINAL 2 OF CAPITAL INTERNATIONAL AIRPORT	ICN-Seoul 01:00 +1 TERMINAL 2 OF INCHEON INTERNATIONAL AIRPORT	Economy 经济舱	OK
1-FEB-20	L8842E	KE093	ICN-Seoul 10:15 TERMINAL 2 OF INCHEON INTERNATIONAL AIRPORT	IAD-Washington 09:50	Economy 经济舱	OK
19-MAR-20	L8842E	KE094	IAD-Washington 12:50	ICN-Seoul 16:30 +1 TERMINAL 2 OF INCHEON INTERNATIONAL AIRPORT	Economy 经济舱	OK
20-MAR-20	L8842E	KE853	ICN-Seoul 19:00 TERMINAL 2 OF INCHEON INTERNATIONAL AIRPORT	PEK-Beijing 20:25 TERMINAL 2 OF CAPITAL INTERNATIONAL AIRPORT	Economy 经济舱	OK

FARE SUMMARY

FARE/机票款: CNY1848.00

TAX/税费: CNY2693.00

TOTAL/总计金额: CNY4541.00


IMPORTANT NOTES

- YOU ARE REQUIRED TO GET TO THE INDICATED AIRPORT NO LATER THAN 2 HOURS BEFORE THE SCHEDULED DEPARTURE TIME FOR CHECK-IN AT THE COUNTER. YOU MUST PRESENT THE SAME VALID ID CARD AS WHICH YOU USED TO PURCHASE THE TICKET
- WHEN YOU GO THROUGH SECURITY CHECK, YOU MUST PRESENT YOUR VALID TRAVEL DOCUMENTS AND BOARDING PASS AS WELL AS THE RECEIPT
- FAILED TO USE FLIGHT COUPONS IN SEQUENCE WILL RESULT PENALTY AND ADDITIONAL FARE PAYMENT
- CARRIAGE AND OTHER SERVICES PROVIDED BY THE CARRIER SUBJECT TO CONDITIONS OF CARRIAGE, WHICH ARE HEREBY INCORPORATED BY REFERENCE. THESE CONDITIONS MAY BE OBTAINED FROM THE ISSUING CARRIER. PASSENGERS ON A JOURNEY INVOLVING AN ULTIMATE DESTINATION OR STOP IN A COUNTRY OTHER THAN THE COUNTRY OF DEPARTURE ARE ADVISED THAT INTERNATIONAL TREATIES KNOWN AS THE MONTREAL CONVENTION, OR ITS PREDECESSOR, THE WARSAW CONVENTION, INCLUDING ITS AMENDMENTS (THE WARSAW CONVENTION SYSTEM), MAY APPLY TO THE ENTIRE JOURNEY, INCLUDING ANY PORTION THEREOF WITHIN A COUNTRY. FOR SUCH PASSENGERS, THE APPLICABLE TREATY, INCLUDING SPECIAL CONTRACTS OF CARRIAGE EMBODIED IN ANY APPLICABLE TARIFFS, GOVERNS AND MAY LIMIT THE LIABILITY OF THE CARRIER. CHECK WITH YOUR CARRIER FOR MORE INFORMATION. FURTHER INFORMATION MAY BE OBTAINED FROM THE CARRIER. WITH THIS TICKET YOU WILL RECEIVE A SET OF NOTICES WHICH FORMS PART OF THE TICKET AND CONTAINS THE "CONDITIONS OF CONTRACT AND OTHER IMPORTANT NOTICES". PLEASE MAKE SURE THAT YOU HAVE RECEIVED THESE NOTICES, AND IF NOT, CONTACT THE ISSUING AIRLINE OR TRAVEL AGENT TO OBTAIN COPIES PRIOR TO THE COMMENCEMENT OF YOUR TRIP.

CERTIFICATE OF SERVICE

I, Shaoming Cheng, Esq., counsel for the Defendant, hereby certify that on March 6, 2020, a copy of the foregoing document was mailed by prepaid first-class mail to

The United States Attorney's Office
Justin W. Williams United States Attorney's Building
2100 Jamieson Ave
Alexandria, VA 22314



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